

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

STELLA MORRISON

§

§

vs.

§

§

Case No. 1:13-cv-00327-KFG

**LAYNE WALKER, THE COUNTY OF
JEFFERSON, TEXAS, and THE STATE
OF TEXAS,**

§

§

§

**JOINT MOTION TO RELEASE CASH SECURITY
IN COURT'S REGISTRY**

TO THE HONORABLE JUDGE OF THIS COURT:

The only parties who remain before this Court are John Morgan and Layne Walker. Morgan and Walker jointly file this motion asking the Court to release cash security that Morgan placed in the Court's registry. More specifically, Morgan and Walker respectfully show the Court as follows:

1. On August 22, 2018, this Court signed an order and judgment assessing \$29,592.50 in Section 1927 sanctions against John Morgan. *See* Doc. 185.
2. On September 6, 2018, Morgan deposited the amount of \$35,761.00 into the registry of the Court to supersede execution of this Court's judgment pending Morgan's appeal to the United States Court of Appeals for the Fifth Circuit. *See* Doc. 188.
3. On October 1, 2019, the Fifth Circuit affirmed this Court's order and judgment against Morgan.
4. Morgan and Walker respectfully request that the Court enter an order releasing the cash security in the Court's registry as follows:

a. The sum of \$31,889.52 should be released to Walker by check or other instrument payable to Mark C. Sparks at The Ferguson Law Firm, LLP, 350 Pine Street, Suite 1440, Beaumont, Texas 77704-4095.

b. The remaining balance of \$3,871.48, plus any accrued interest, should be released to Morgan by check or other instrument payable to John S. Morgan at the Morgan Law Firm, 2175 North Street, Suite 101, Beaumont, Texas 77701.

5. Morgan and Walker respectfully request that the Court's order specify that the release of the funds from the Court's registry, as described above, satisfies and fully discharges Morgan from this Court's order and judgment of August 22, 2018.

Respectfully submitted,

By: /s/ Mark C. Sparks

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By: /s/ John S. Morgan

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that I have conferred with Mark Sparks, counsel for Defendants, who has confirmed that his client, Layne Walker, agrees to, and joins in, the relief requested in this motion.

/s/ John S. Morgan

JOHN S. MORGAN

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was served on the following counsel of record via the Court's electronic filing system:

Mark C. Sparks
The Ferguson Law Firm, LLP
350 Pine Street, Suite 1440
Beaumont, Texas 77704-4905

/s/ John S. Morgan

JOHN S. MORGAN